

## MARIETTA CITY SCHOOLS

National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE.  
Washington, DC 20590.

Subject: 49 CFR Part 571  
[Docket No. NHTSA-2008-0163]  
RIN 2127-AK09  
Federal Motor Vehicle Safety  
Standards; Seating Systems,

DEPT. OF TRANSPORTATION  
DOCKETS

2008 DEC - 3 A 10:05

Administrator,

Please consider this a petition to reconsider implementing the "self-latching mechanism on seat bottom cushions that are designed to flip up or be removable without tools."

This new requirement is an accident waiting to happen. Students will quickly learn that they can unlatch the seats and pull or push them out of place or simply unlatch them as a prank. I can foresee instances where students will unlatch most of the seats and place items in the latch mechanism so the seats will have to be taken out so the mechanism can be cleared of the obstruction. An unlatched seat will just become another object to fly around the bus in the case of an accident. A rollover accident with unlatched seats would not only have the seats flying around but would also expose the seat frame which could cause additional injuries.

I believe this new requirement should be overturned as it in itself is a safety hazard.

Sincerely,



Robert Strobl  
Business Manager  
Marietta City School District

"Opening Doors to a World of Opportunities"